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November 18, 2020

Application Granted.

Hon. Kevin P. Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007
Via ECF

So Ordered:


Hon. P. Kevin Castel, U.S.D.J.

11-18-20

Re: *United States v. Kenneth Wynder*, 20 Cr. 470 (KPC)

Dear Judge Castel:

Please accept this letter as an application, on behalf of Kenneth Wynder, for whom I have been appointed, for the following relief:

1. An order appointing my full time associate, Ying Stafford, as associate counsel, at the rate of \$110.00 per hour, the normal rate for full time associates, for seventy five hours; and
2. An order permitting counsel to file interim vouchers.

We have just received the discovery index in this matter and are about to receive the hard drive containing over five hundred thousand pages of initial discovery, a truly voluminous amount. The appointment of associate counsel is critical to the efficient preparation of this complex matter.

Ms. Stafford is an experienced federal practitioner who has worked with me on several complex matters, including *U.S. v. Basciano*, 05 Cr. 60 (NGG), the death penalty trial of the acting boss of the Bonano crime family. Mr. Stafford's contribution to the defense will facilitate discovery review, client review of discovery and client contact, and investigation, all of her hours at a lower rate than mine.

If this application is agreeable, may I impose upon Your Honor to "so order" this letter and

post it on ECF. Thank you for your consideration. I remain

Respectfully,
S/GRGoltzer
George R. Goltzer

All parties via ECF

GRG/ms